

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*¹

Debtors.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

PUERTO RICO SALES TAX FINANCING
CORPORATION,

Debtor.

PROMESA

Title III

No. 17 BK 3284-LTS

STIPULATION AND PROPOSED ORDER TO FURTHER EXTEND DEADLINES SET FORTH IN THE COURT'S ORDER ENTERED ON FEBRUARY 14, 2019 (ECF NO. 596)

¹ The Debtors in these Title III Cases, along with each Debtor's respective title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), as fiscal agent and financial advisor of the Commonwealth of Puerto Rico (the “Commonwealth”), and the Official Committee of Unsecured Creditors (the “UCC,” and together with AAFAF and the Commonwealth, the “Parties”) respectfully submit the following *Stipulation and Proposed Order to Further Extend Deadlines Set Forth in the Court’s Order Entered on February 14, 2019 (ECF No. 596)* (the “Stipulation”) requesting entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), to amend the deadlines in connection with the *Informative Motion Regarding Stipulation Section 15.2 Expenses* [ECF No. 582] (the “Motion”).

WHEREAS, on February 14, 2019, the Court entered the *Order Setting Deadline for Joint Status Report in Connection with Informative Motion Regarding Stipulation Section 15.2 Expenses* [ECF No. 596], setting a deadline for AAFAF and the UCC to file a joint status report in connection with the Motion and for AAFAF to file a further separate brief by the same deadline regarding its positions on the contracting issues raised by the UCC if those issues have not been resolved consensually.

WHEREAS, on February 20, 2019, the Court entered the *Order Revising Deadlines Set Forth in the Court’s Order Entered on February 14, 2019 (ECF No. 596)* [ECF No. 607] (the “Revised Scheduling Order”), extending the deadlines in connection with the Motion.

WHEREAS, under the Revised Scheduling Order, the joint status report is due April 4, 2019, and the matter will be heard at the April 24, 2019 omnibus hearing.

NOW THEREFORE, the Parties have agreed to the following extension of deadlines set forth in the Revised Scheduling Order in order to permit the Parties to continue to meet and confer in an attempt to consensually resolve outstanding issues regarding the Motion:

1. May 24, 2019: AAFAF and the UCC to file a joint status report. Unless the UCC's objections have been resolved, AAFAF will file a separate brief regarding its positions on the contracting issues raised by the UCC;
2. June 12, 2019: Motion to be heard at the June Omnibus Hearing.
3. For the avoidance of doubt, nothing herein shall affect the rights of any party, person, or entity with respect to discovery, or to oppose discovery, in connection with the Motion, or to seek further adjournment of the Motion, or to oppose such adjournment, all of which rights are fully preserved.

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Dated: San Juan, Puerto Rico
April 2, 2019

/s/ Peter Friedman

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Dated: San Juan, Puerto Rico
April 2, 2019

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